

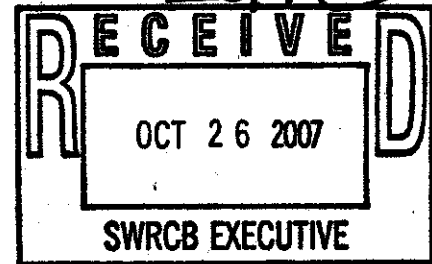
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October 26, 2007

Ms. Tam M. Doduc, Chair  
State Water Resource Control Board Members  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814  
Fax: 916-341-5620



RE: Written Comments on the Proposed Water Recycling Policy and Staff Draft Report

Ms. Doduc and Board Members:

The Planning and Conservation League (PCL) strongly supports the aggressive implementation and development of recycled water in California. Recycled water is a low-impact water resource which promotes regional water self-sufficiency and decreases reliance on water diversions from the Delta, and other sensitive ecosystems. Development of recycled water is urgent given climate change is increasing the frequency of weather variability and natural disasters such as droughts, fires, mudslides, and decline of Sierra snow pack. Recycled water is a viable option for California which, with adequate policy, will offer a consistent drought proof water supply year round.

The State Water Resources Control Board's (SWRCB) proposed policy must be designed to encourage implementation of recycled water by eliminating uncertainties and barriers. It is essential that the new policy is environmentally sound and that the policy protect public health. Public concern and lack of education have been a significant hindrance in advancing new recycled water programs. It is crucial that this policy guarantee the public that their wastewater can be treated and processed into a safe and reliable resource. PCL recommends the following for your consideration:

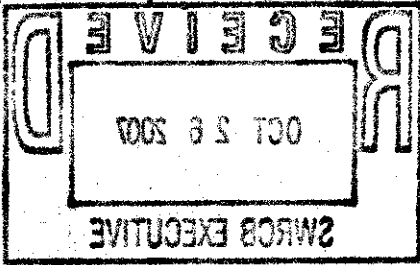
### Safeguard Public Health

Public perception and confidence in recycled water programs must be specifically addressed in the proposed policy. Transparency and education are critical to gaining public confidence, and can change public perception, ensuring the success of a recycled water program. Without the support of the public, beneficial projects can cease or project progress may falter. PCL proposes that the "Water Recycling Policy" include recommendations on project proponents for public outreach and education. We also suggest the following in regard to the proposed "Water Recycling Policy" in context of public health and support:



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Paragraph 12, page 2:

*Through control of industrial discharges and self-regenerating water softeners, a recycled water producer can limit to 300 milligrams/liter (mg/l) the increase of TDS from a community's source water supply to its produced recycled water.*

To guarantee the highest amount of protection the SWRCB should not adopt a blanket policy that allows degradation. Instead, the SWRCB can adopt a protective policy which requires project proponents to use the best technology available and mitigate, to the extent feasible, water quality impacts. The proposed policy should be amended to specify that water quality shall only be decreased in the event that there is no alternative methods to meet existing water quality, and only at that point would there be an allowance of a decrease of a maximum of 300 mg/l or less.

Paragraph 2, page 1:

*"The use of recycled water can provide a reliable local water supply for non-potable urban use, agricultural irrigation, and industrial uses..."*

PCL would like to recommend SWRCB include groundwater recharge, indirect potable use, and environmental benefits are also included in this section.

Recycled water can play a critical role in meeting the needs of California's growing population, our economy, and environment. The 2003 Recycled Water Task forces found, "by 2030 recycled water use can increase to 2 million acre-feet per year, with proper incentives, of that 1.6 million acre-feet would be considered new water supply." SWRCB's "Water Recycling Policy," with the additions and clarification addressed in the body of this letter, can significant initial step to reach or exceed our 2 million acre-feet goal by creating uniformity of policy and mitigating uncertainty, while having the support of the public.

The Planning and Conservation League appreciates the opportunity to offer comments on this influential new policy.

Sincerely,

